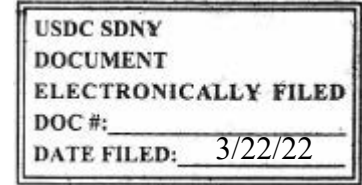


# Lex Lumina PLLC

Rhett O. Millsaps II | rhett@lex-lumina.com | 646.535.1137

March 21, 2022



VIA ECF

The Honorable Alison J. Nathan  
United States District Court  
Southern District of New York  
40 Foley Square, Room 2102  
New York, NY 10007


Re: Hermès International et al. v. Rothschild, 22-cv-00384-AJN-GWG

Dear Judge Nathan,

My firm represents Defendant Mason Rothschild in the above-referenced matter. We submit this letter motion to extend the time to file Defendant's motion to dismiss the Amended Complaint (Dkt. No. 24) pursuant to Federal Rule of Civil Procedure 6(b). Plaintiffs Hermès International and Hermès of Paris, Inc. consent to this request.

Defendant's response to the Amended Complaint was due on March 16, 2022. Our office recently implemented new systems, including a calendaring system; due to an inadvertent calendaring error, we believed in good faith that Defendant's response was due on March 23. As the firm's Managing Member, I take full responsibility for this mortifying but unintentional error. Plaintiffs' counsel courteously notified us of this error by email late Friday afternoon, March 18, and we immediately called Plaintiffs' counsel to explain the situation and to seek Plaintiffs' consent for this belated extension request. Plaintiffs gave their consent this morning, and we are promptly filing Defendant's motion to dismiss concurrently with this letter motion.

Plaintiffs consent to and will not be prejudiced by this short extension; the short delay will not affect the judicial proceedings in this case; and Defendant has acted in good faith. Accordingly, we respectfully request that the Court grant a short extension of time to file Defendant's response to the Amended Complaint and deem Defendant's motion to dismiss timely filed today.



3/22/22  
SO ORDERED.  
ALISON J. NATHAN, U.S.D.J.

Sincerely,



Rhett O. Millsaps II